

In the Matter of:

Rooterman, LLC vs

Klodian Belegu, Quality Air Care Corporation, et al.

Klodian Belegu

March 12, 2025

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1 (Resumed at 11:56.)

2 Q. Mr. Belegu, we're back on the record. You
3 said you formed lots of corporations over the
4 years; can you estimate how many?

5 A. No, I can't recall.

6 Q. Say that again.

7 A. I can't recall.

8 Q. Do you use a lawyer to form corporations or
9 do you do them on your own?

10 A. Sometimes a lawyer, sometimes my wife.

11 Q. And who's the lawyer you used?

12 A. It was Paterno Law Firm.

13 Q. So if there was a corporation formed for
14 you by a lawyer, it would be the "Paterna" Law Firm
15 that did it?

16 MR. WOLMAN: Paterno.

17 A. Paterno, yes.

18 Q. And where in New Jersey is the Paterno Law
19 Firm?

20 A. Actually, they are in Broadway, in New York
21 City, and the lawyer lives in Toms River.

22 Q. Do you know whether every entity that's
23 been formed for you is a New Jersey entity?
24 Because, for example, you could form a Delaware

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1 corporation.

2 A. I don't know. If a lawyer did it, I have
3 no idea. I wouldn't say that is anything in
4 Delaware, but I'm going to have to ask my wife or
5 Sandro about that.

6 Q. So your wife or who would know?

7 A. Sandro, Alessandro.

8 Q. Alexandra?

9 A. Sandro is the lawyer, Sandro Paterno, yes.

10 Q. Sandro Paterno?

11 A. Yes.

12 Q. So that we have the spelling, is it
13 S A N D R O?

14 A. Sandro, yes, I believe so. I called him
15 Alessandro for some reason for the past 20 years,
16 but I had it wrong, and he never said anything.

17 Q. So I've heard you say that you did water
18 damage restoration work through Quality Air Care
19 Corporation?

20 A. Correct.

21 Q. Two companies with the words "water damage"
22 in them?

23 A. Correct.

24 Q. Are there any other corporations you've

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1 A. Century -- I forget his company name.

2 THE REPORTER: Did you say Cedric or
3 Century?

4 THE WITNESS: No, I'm trying figure
5 out.

6 A. It's Drew Madore is his last name.

7 Q. So Mr. Madore, M A D O R E?

8 A. I believe so. I forgot his company name,
9 starts with S.

10 Q. And he does websites work for you?

11 A. He does.

12 Q. Has he always done the website work for
13 you, or has there been somebody else?

14 A. There have been other people previously.

15 Q. Who did you have before Mr. Madore?

16 A. I can't recall their names, but it probably
17 has been a short time. He has been the one and his
18 company the longest working, so technically since
19 2021 he has been dealing with.

20 Q. So when you first got your franchise, your
21 first franchise, did you have any employees?

22 A. Did I have any employees? I hired 1099
23 employees for different territories, yes.

24 Q. And what were their roles?

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1 A. That used to be the front sign on our
2 office, yes.

3 Q. When you say "that used to be the front
4 sign on our office," I'm going to show you what
5 we'll mark as Exhibit 5.

6 (Exhibit 5, Photograph, marked for
7 identification.)

8 Q. What are we looking at in Exhibit 5?

9 A. A picture of my office.

10 Q. And what office is that?

11 A. The one in Toms River, 1049 Church Street.

12 THE REPORTER: Say it again.

13 THE WITNESS: 1049 Church Street, or
14 Church Road, my apologies.

15 Q. And when did that sign get placed outside
16 of that office?

17 A. Back in 2023.

18 Q. Why in 2023?

19 A. Because that's when everything merged and
20 we all moved in that office on end of 2022.

21 Q. When you say "everything merged," what are
22 you referring to?

23 A. Me, Kleves and Duljan and Toni.

24 Q. That's when you merged RM Water Damage